

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAISIIN BETHEA, FREDDIE GONZALEZ,
JASON GUISHARD, OMAR HARRIS,
ALEX MASS, and RODNEY
VANTERPOOL, individually,

Plaintiffs,

-against-

EQUINOX FITNESS CLUB, EQUINOX
HOLDINGS, INC., THE EQUINOX
GROUP, INC, EQUINOX COLUMBUS
CENTRE, INC., BROADWAY EQUINOX,
INC., EQUINOX 63RD STREET, INC.,
EQUINOX WALL STREET, INC.,
EQUINOX GREENWICH AVENUE, INC.,
EQUINOX TRIBECA INC., DENISE
BERG,

Defendants.

Index No. 07- CV-2018

DECLARATION OF PETER J. KURSHAN

PETER J. KURSHAN, hereby declares, pursuant to 28 U.S.C. § 1746, as
follows:

1. Attached as Exhibit 1 is a true and correct copy of excerpts from the deposition transcript of plaintiff Alex Mass.
2. Attached as Exhibit 2 is a true and correct copy of Mr. Mass' January 27, 2005 letter to defendant Berg.
3. Attached as Exhibit 3 is a true and correct copy of excerpts from the deposition transcript of Matthew Herbert.
4. Attached as Exhibit 4 is a true and correct copy of documents produced by defendants regarding a harassment complaint by Jeannette Cortoreal against Alex Mass.

5. Attached as Exhibit 5 is a true and correct copy of excerpts from the deposition transcript of plaintiff Rodney Vanterpool.

6. Attached as Exhibit 6 is a true and correct copy of excerpts from the deposition transcript of plaintiff Freddie Gonzalez.

7. Attached as Exhibit 7 is a true and correct copy of excerpts from the deposition transcript of plaintiff Jason Guishard.

8. Attached as Exhibit 8 is a true and correct copy of excerpts from the deposition transcript plaintiff Jaisiin Bethea.

9. Attached as Exhibit 9 is a true and correct copy of excerpts from the deposition transcript of Omar Harris.

10. Attached as Exhibit 10 is a true and correct copy of excerpts from the deposition transcript of Denise Berg (Dronsick).

11. Attached as Exhibit 11 is a true and correct copy of excerpts from the deposition transcript of Joel Greengrass.

12. Attached as Exhibit 12 are true and correct copies of some of the Craigslist listings produced by plaintiffs.

13. Attached as Exhibit 13 is a true and correct copy of excerpts from the deposition transcript of Jeff Boyer.

14. Attached as Exhibit 14 is a true and correct copy of advertisement used by defendants.

I declare under penalty of perjury the foregoing is true and correct.

Executed on December 3, 2007.



Peter J. Kurshan